

## Fair Processing Notice for HS1 Limited ("HS1") Candidates

### Introduction

The General Data Protection Regulation outlines 6 principles that all organisations must adhere to, these are:

*Personal data shall be<sup>1</sup>:*

- 1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');*
- 2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ('purpose limitation');*
- 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');*
- 4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');*
- 5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; ('storage limitation');*
- 6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').*

### How HS1 uses your information

All information collected from you or on your behalf by third parties (such as referees) may be used as part of the recruitment process at HS1. We may use such information to ascertain your suitability for the relevant role, contact references, conduct checks and provide you with updates as to the recruitment process. HS1 may also use psychometric testing to inform decision making.

### Information HS1 may collect

As part of your application we may collect the following information from you: name, address and email address.

The information provided to us may also include sensitive personal information relating to your racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, sexual life or criminal record. We will not specifically ask for this information from you but it may become apparent as a result of the details provided to us, such as any hobbies or interests that are included in your CV. We will only process such sensitive personal data with your explicit consent and to the extent necessary to process your application. Providing such sensitive personal information to HS1 is entirely voluntary and if you would like to withdraw such information from your application please contact us as set out below.

### How long HS1 will keep this information

If the candidate is unsuccessful, HS1 will store (by means of a computer database or otherwise) candidate information for up to 6 months following the application, though third parties, such as recruiters or platforms such as LinkedIn, who initially collect this information may retain your information for longer. This is to allow HS1 to consider the application for alternative positions if vacancies emerge in the future.

If the candidate is successful, the information will form part of your employment file and be kept for the duration of the contract of employment and to fulfil the statutory, or recommended, retention periods in accordance with HS1's retention policy (a copy of which can be requested from the Data Protection Officer at [DPO@Highspeed1.co.uk](mailto:DPO@Highspeed1.co.uk)).

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<sup>1</sup> GDPR Chapter 2 Article 5

**HS1's approach to information security**

To protect your information HS1 has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems which can access the information have the necessary security measures in place.

To make sure all HS1 employees, contractors and subcontractors understand these responsibilities they are provided the necessary training and resources they need.

In addition to these operational measures HS1 also uses a range of technologies and security systems to reinforce these policies.

To make sure that these measures are suitable, vulnerability tests are run regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled. Additionally, all areas of the organisation are regularly monitored and measured to identify problems and issues before they arise.

**Your rights****The right to access information we hold about you**

At any point you can contact us to request details of the information we hold about you, as well as the reason we hold that information, who has access to the information and where we obtained the information. Once we have received your request we will respond within 30 days. In order to process your request HS1 may need to verify your identity for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

If your application is successful, as an employee you will be able to access, review, amend and update your Personal Data in your own personnel file through HS1's document control and management system.

**The right to correct and update the information we hold about you**

If the data we hold about you is out of date, incomplete or incorrect, you can inform HS1 and it shall be updated. In order to process your request HS1 may need to verify your identity for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

**The right to have your information erased**

If you feel that we should no longer be using or holding your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted. In order to process your request HS1 may need to verify your identity for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

**The right to object to processing of your data**

You have the right to request that HS1 stops processing your data. Upon receiving the request we will contact you to confirm whether we are able to comply or if not, in light of the legitimate grounds we have to continue processing your data. For example, even if your data is no longer actively processed, HS1 may continue to hold your data to comply with its legal obligations and your other rights. In order to process your request HS1 may need to verify your identity for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

**The right to data portability**

You have the right to request that we transfer your data to another controller. Once HS1 receives your request, we will comply where it is feasible. In order to process your request HS1 may need to verify your identity for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

**Consent**

Where we need your consent to hold your information or data (e.g. in relation to any sensitive personal data provided by you as part of this application), we will only do so in accordance with this fair processing notice. By checking the box below, you are stating that you are informed of the reason for which HS1 is collecting the information, how we will use it, for how long we will keep it, who else will have access to the information and what your rights are as a data subject. In

such case where you have given consent you have a right to withdraw such consent. Once HS1 receives your withdraw request, we will comply where it is feasible (and we will inform you to the extent that it is not feasible).

In order to process your request to exercise your rights above, HS1 may need to verify your identify for your own security and in such cases your response in respect of this verification will be necessary to enable you to exercise your right to access information.

**Sharing your information**

HS1 will not share your information with third parties unless and until you become an employee. We have a different Fair Processing Notice which applies to employees.

**Cookies and Tracking**

When visiting HS1’s websites or web related services it may necessary for cookies with information to be created. Please see the website privacy policy for further information a copy of which can be provided on request.

**Enquiries**

When contacted with an enquiry, HS1 will hold the entity name and contact details only for the purposes of handling the enquiry.

The online forms are subject to the same cookies and tracking as the rest of the website (see the above section “Cookie and Tracking information” for more information).

**Contact details**

If have any queries about this notice, need further information or wish to lodge a complaint you can use the details below to contact the relevant party.

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| <b>HS1 Limited</b><br><br><i>HS1 Limited , 5<sup>th</sup> Floor, King Place, 70 York Way,<br/>London N1 9AG</i> | Tel: 020 7014 2700                               |
| <b>Data Protection Officer</b>  | Email: DPO@Highspeed1.co.uk<br><br>020 7014 2750 |